

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER RESEARCH LLC

*Plaintiff,*

v.

SAMSUNG ELECTRONIC CO., LTD and  
SAMSUNG ELECTRONICS AMERICA, INC.,

*Defendants.*

Case No. 2:22-CV-00422-JRG-RSP

**SAMSUNG’S UNOPPOSED MOTION TO WITHDRAW ITS OPPOSED MOTION TO  
COMPEL HEADWATER TO PROVIDE SIGNED AUTHORIZATION FOR  
QUALCOMM TO RELEASE DR. GREGORY RALEIGH’S EMPLOYMENT RECORDS  
(D.I. 105)**

Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung”) hereby files this Unopposed Motion to Withdraw its Opposed Motion to Compel Headwater to Provide Signed Authorization for Qualcomm to Release Dr. Gregory Raleigh’s Employment Records (D.I. 105). Although Samsung’s efforts to obtain the signed authorization form without resorting to motion practice were unsuccessful, Plaintiff has now provided such form to Samsung. Thus, Samsung respectfully requests that the Court grant its request to withdraw its Opposed Motion to Compel (D.I. 105) without prejudice to its ability to file any Motion to Compel in the future to the extent the Court may permit. Plaintiff Headwater Research LLC does not oppose this motion.

Dated: February 22, 2024

Respectfully submitted,

By: /s/ Jared Hartzman

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was filed electronically in compliance with Local Rule CV-5 on February 22, 2024. As of this date, all counsel of record had consented to electronic service and are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(a)(3)(A).

/s/ Jared Hartzman